

## Appointment

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**Sent:** 10/24/2019 8:58:58 PM  
**To:** O'Neill, Sandra [ONEill.Sandra@epa.gov]; Pfeifer, Chris [Pfeifer.Chris@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Hopkins, Yvette [Hopkins.Yvette@epa.gov]; Wait, Monica [Wait.Monica@epa.gov]; Wormell, Lance [Wormell.Lance@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Jones, Ricardo [Jones.Ricardo@epa.gov]; Ambrosino, Helene [Ambrosino.Helene@epa.gov]; Teter, Royan [Teter.Royan@epa.gov]; Trivedi, Adrienne [Trivedi.Adrienne@epa.gov]; Varco, Joseph [varco.joseph@epa.gov]  
**BCC:** DCRoomPYS7731E/Potomac-Yard-One [DCRoomPYS7731E@epa.gov]  
**Subject:** SFIREG Issue Paper: Pesticide Impurities, Conf. # [Ex. 6 Personal Privacy (PP)] ID# [Ex. 6 Personal Privacy (PP)]  
**Attachments:** SFIREG Issue Paper\_PRN 96-8 Pesticide Impurities\_2018 (OR).pdf; Synopsis Contaminants SFIREG Issue Paper 101618.docx  
**Location:** DCRoomPYS7731E/Potomac-Yard-One  
**Start:** 10/31/2019 1:00:00 PM  
**End:** 10/31/2019 2:00:00 PM  
**Show Time As:** Busy

Conf. #: [Ex. 6 Personal Privacy (PP)]  
ID#: [Ex. 6 Personal Privacy (PP)]  
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All,

The purpose of this meeting is to review the Pesticide Impurities in EPA Registered Pesticides issue paper from SFIREG.

During FEAD's initial assessment of the issue paper, we noted these are complex issues which may not have a quick or easy fix. We are proposing to: 1) thoroughly understand the issues; and 2) identify the low hanging fruit – which follow-up actions are feasible in the near term, versus what actions are long term or beyond our current resource constraints.

Attached you will find 1.) the SFIREG issue paper (PDF) and 2.) FEAD's synopsis of the issue. Below, we are also providing a brief summary of the issue.

### Summary of Issue:

#### **ct 2018 Issue Paper: Pesticide Impurities in EPA Registered Pesticides**

- Summary of issue: States have identified pesticide products in the market that are identified as "organic products" that contain residues of other pesticidal active ingredients, which are being claimed as "impurities" as defined by PR Notice 96-8. This is problematic under the National Organic Program guidelines and because these products are being used on crops for which the pesticide a.i. "impurities" are not registered uses. The "Toxicologically Significant Levels of Contaminants" table in PRN 96-8 is problematic, and being used as a loop hole, due to the generic levels defined for contaminants (i.e. 1000 ppm) that do not have a quantitative risk basis.
- Key divisions for resolution: BPPD (Chris Pfeifer), RD (Dan Rosenblatt or delegated staff), FEAD (Yvette Hopkins, Sandra O'Neill, Monica Wait, Lance Wormell, Jackie Mosby), OECA/Office of Compliance (Ricardo Jones and Helene Ambrosino), and OECA/Office of Civil Enforcement (Royan Teter, Adrienne Trivedi, Joe Varco)